

**Region 4 Publicly Owned Treatment Works
Management, Operations and Maintenance (MOM) Programs Project**

Region 4 Management, Operations and Maintenance Work Group
Standard Management Procedure

**Results of EPA Region 4 Audit
or
Utility Self-Audit Review
for**

Guidance and Information Purposes Only

Do Not Use Checklist as Your Self-Audit/Self Disclosure Report

**NOTE THAT PAGES (2-46) THROUGH (2-47) ARE ENFORCEMENT CONFIDENTIAL -
ATTORNEY CLIENT PRIVILEGED AND ARE NOT AVAILABLE UNDER FOIA ONCE
COMPLETED FOR A SPECIFIC UTILITY**

United States Environmental Protection Agency
Region 4
Water Management Division
Water Programs Enforcement Branch

61 Forsyth Street, SW
Atlanta, Georgia 30303
February 29, 2000

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DISCLAIMER

This document is the work product of the Region 4, Water Management Division, Water Programs Enforcement Branch, MOM Work Group. It is meant to be a part of the Work Group's Standard Operating Procedure for conducting the Publicly Owned Treatment Works - Management, Operations and Maintenance (MOM) Programs Project. The Project is conducted in compliance with EPA Policy, EPA Guidance, and Rules and Regulations promulgated under the Clean Water Act. If some statement or part of the document is not in compliance with the Act, EPA Policy, EPA Guidance or the Rules and Regulations, it is a mistake and should not be construed as conveying rights not conveyed by the Clean Water Act, EPA Policy, or the Rules and Regulations.

Chapter 1: Region 4 Approach to Conducting Audit or Reviewing Self-Audit

United States Environmental Protection Agency
Region 4
Water Management Division
Water Programs Enforcement Branch

61 Forsyth Street, SW
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February 29, 2000

1. Definitions Used by Region 4 During the POTW MOM Project

Capacity Related Overflow: Means an overflow that occurs when a system is not able to convey all the wastewater to the treatment plant because of insufficient grade, pipe size, wet well size, pump capacity or force main size or because of a design flaw and the overflow cannot be corrected through proper operation and maintenance.

Combined Sewer: A sewer that is designed as a sanitary sewer and a storm sewer (see 40 CFR 35.2005(b)(11)).

Chronic Overflows: Means repeated overflows at the same location in the system, repeated overflows from the system for the same root cause, or both.

Critical Part: Means any part of the utility's collection, transmission or treatment system for which the time required to acquire a replacement part would result in, or extend, a permit violation or a sanitary sewer overflow, including an un-permitted discharge. The replacement for a critical part is called a critical spare part.

Egregious Overflows: Means continuing chronic overflows or those large overflows having a root cause that utility's specific MOM program is not followed or when the utility's specific standard operating procedure or standard maintenance procedure is not followed.

Frequent Overflows: Means those overflows that, in the judgement of the regulatory authority based on system size and complexity, require a high level of improvement in a utility's management, operation and maintenance programs.

Inflow : Means water other than wastewater that enters a sewer system (including sewer service connections) from sources such as, but not limited to, roof leaders, cellar drains, yard drains, area drains, drains from springs and swampy areas, manhole covers, cross connections between storm sewers and sanitary sewers, catch basins, cooling towers, storm waters, surface runoff, street wash waters, or drainage. (see 40 CFR 35.2005(b)(20)).

Infiltration: Means water other than wastewater that enters a sewer system (including sewer service connections and foundation drains) from the ground through such means as defective pipes, pipe joints, connections, or manholes. (see 40 CFR 35.2005(b)(20)).

Infrequent Overflows: Means those overflows that, in the judgement of the regulatory authority based on system size and complexity, require some level of improvement in a utility's management, operation and maintenance programs. Usually associated with isolated overflows.

Isolated Overflows: Means those overflows that are not chronic.

Maintenance Related Overflow: Means an overflow that occurs when an adequately designed and sized system that is well operated is not able to convey all the wastewater to the treatment plant because of poor maintenance.

Municipality: Means a city, town, borough, county, parish, district, association or other public body created by or under State law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA (see 40 CFR 122.2)

Operations Related Overflow: Means an overflow that occurs when an adequately designed and sized system that is well maintained is not able to convey all the wastewater to the treatment plant because of poor operation.

Rainfall Induced Infiltration (RII): Means the portion of infiltration flows (flows coming from infiltration sources) that enters the sewerage system during and immediately after rainfall events. Rainfall induced infiltration does not include inflow.

Regional Collection and/or Treatment System: A collection system or treatment system that accepts wastewaters from satellite collection systems.

Sanitary Sewer: A conduit intended to carry liquid and water carried wastes from residences, commercial buildings, industrial plants and institutions together with minor quantities of ground, storm and surface waters that are not admitted intentionally. (See 40 CFR 35.2005(b)(37).)

Sanitary Sewer Overflow: A sanitary sewer overflow is an overflow, spill, release, or diversion of wastewater from a sanitary sewer system. Sanitary sewer overflows include:

- (A) overflows or releases of wastewater that reach waters of the United States;
- (B) overflows or releases of wastewater that do not reach waters of the United States; and
- (C) wastewater backups into buildings that are caused by blockages or flow conditions in a sanitary sewer other than a building lateral. Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned is not a sanitary sewer overflow.

Satellite Collection System: Means a collection system that is owned and operated by one entity that discharge to a regional collection system that is owned and operated by a different entity.

Satellite collection systems depend on a separate entity for wastewater treatment and discharge.

SP: See Standard Management Procedure

SMP: See Standard Maintenance Procedure

SOP: See Standard Operating Procedure

Standard Management Procedure (SP): Means the steps defined by the organization that are to be followed by trained personnel in order to successfully complete a management activity or task.

Standard Maintenance Procedure (SMP): Means the steps defined by the organization that are to be followed by trained personnel in order to successfully complete a maintenance activity or task.

Standard Operating Procedure (SOP): Means the steps defined by the organization that are to be followed trained personnel in order to successfully complete a operating activity or task.

Un-Permitted Discharge: Means the discharge of wastewater containing pollutants to the waters of the United States directly or by way of the storm drainage infrastructure that is not authorized by an NPDES permit.

2. Introduction

A. Basic Concept

MOM programs are utility specific. Utilities may have different titles for the various MOM programs and may have them organized differently than we do in the Region 4 guidance. Most, if not all, of the programs used in the development of this check sheet will be part of sewerage utilities actual programs. However, individual utilities may not need to have all of the listed programs. Individual utilities may choose to consolidate some of the closely related MOM programs or individual utilities may not need all of the program because of utility specific circumstances. Finally, individual utilities may have additional MOM programs that are not contained in this check sheet.

The concept behind the Project is that the self-audit report is not to be written for Region 4. Rather, it is to be prepared for the utility management and utility policy makers and then submitted to Region 4 as evidence of program status .

The seven elements that should comprise every proper MOM program is emphasized by Region 4 during the meeting that the Region conducts in each of the Project watersheds. These are as follows:

- ! *Must be POTW specific* (common thread for each of the remaining six elements)
- ! Must have a purpose (take from written program documentation)
- ! Must have a defined goal (take from written program documentation)
- ! Must be in writing (incorporate by reference)
- ! Must be implemented by trained personnel (or contracted personnel)
- ! Must have performance measures (to determine program effectiveness)
- ! Must be subject to periodic evaluation (including, or beginning with, this audit)

B. POTW Specific

Region 4 has made it clear that having programs that are specific to the individual POTW means that the programs should be tailored to match the POTW's geographic, physical and climatic conditions, the system's level of complexity, the configuration of the systems infrastructure and the system's level of sophistication. Utilities may have a number of the needed MOM programs implemented through contract rather than by their own trained personnel.

C. Program Purpose

The program purpose is the reason why the program is needed and why it exists.

Example: The purpose our utility's smoke testing program is to identify sources of inflow

our sewer system that need to be eliminated so that we can regain some of our peak flow capacity.

D. Program Goal

The individual program goal(s) establishes the desired accomplishments of the individual MOM program during the upcoming fiscal year. The program goal should be summarized in the audit.

Example: The goal our smoke testing program for this fiscal year is to reclaim system peak capacity, and to reduce treatment plant hydraulic loading by identifying sources of inflow to the system by conducting investigations in the ABC and DEF sewer sheds. This goal will be accomplished in the most cost effective manner possible using our personnel and by using a contractor.

E. Program Documentation

The program documentation specifies, in writing, the details of the activities and procedures that are followed to implement the program. Program documentation should be referenced in the audit.

Example: Our utility has a long-term, ongoing, smoke testing program. The program priorities and standard operating procedures are contained in the document entitled, "XYZ Utility Continuing Sewer Assessment Program, Chapter 3".

F. Implemented by Trained Personnel

The training program followed to ensure that Utility personnel are well trained to implement each program and successfully achieve each program's goals should be referenced in the audit.

Example: All personnel assigned to our smoke testing activity receive three hours of basic training followed by eighty (80) hours of on-the-job training to assure competency. Our contract with outside sources to conduct smoke testing requires the contractor to follow our standard operating procedures.

G. Performance Measures

Appropriate performance measures should be established for each program. This should be done on an annual basis. The audit should evaluate how well the program accomplished the program goals established at the beginning of the year and whether the program, as implemented, is the most cost effective approach.

Describe the results of the self-audit process with regard to this program. Are there program design, resource or implementation deficiencies that keep the program from achieving its performance measures? Are these program deficiencies leading to sanitary sewer overflows, permit violations or Clean Water Act violations? Are there program deficiencies leading to decreased customer service and/or unwarranted deterioration of utility assets? Are there changes that should be made to the program that will make its implementation more efficient, thereby conserving resources for better implementation of other programs? Identify remedies to correct deficiencies and include a proposed schedule for those remedies.

Example: During this fiscal year, the performance goal is to smoke test 200,000 lineal feet of gravity sewer in two sewersheds selected according to our priority procedures. Last year, we exceeded our performance goal of 178,000 lineal feet of gravity sewer by smoke testing 193,000 lineal feet. As a result, 623 defects were identified and passed on to our rehabilitation and private service lateral programs for correction.

H. Periodic Evaluation

Proper management, operation and maintenance program implementation requires the utility to assess performance on a regular basis, usually annually. The purpose of the evaluation is to determine whether the programs are achieving established goals and to determine if the program is being implemented efficiently and at the least cost.

Example: The smoke testing program has yielded good results during the past four years. Following our priority criteria, most significant inflow problems have been eliminated. Next year, the program will be reduced by 25% and the resources applied to our maintenance of way program. Peak flows will be monitored at key locations to determine if this reduction in the smoke testing program will need to be reversed in the future. Additionally, we are conducting a cost analysis to determine whether we should contract for all smoke testing work in the future.

3. Region 4 MOM Programs Audit or Utility Self-Audit Review Procedure

Region 4 uses the following procedure to conduct an audit of a sewerage utility's collection, transmission and treatment infrastructure. We suggest that Utility management adopt the same procedure, or some modification of it, when conducting their own self-audit.

A. Management Interview

Region 4 personnel conduct a series of comprehensive interviews with the utility's senior managers and program managers. The purpose of these interviews is to develop a general understanding of the utility, its management philosophy, and the scope of the utility's management, operation and maintenance programs.

B. Field Evaluation

Region 4 personnel conduct a series of field or on-site evaluations with management, operation and maintenance programs personnel. These evaluations are comprised of interviews and on-the-job observations. The purpose of these evaluations is to determine, in detail, how the specific management, operation and maintenance program activities are being carried out. The evaluations allow Region 4 personnel to assess how well personnel understand the utility's functions, how well the personnel are trained, and how closely the personnel follow the utility's standard operating procedures. Additionally, Region 4 inspect all maintenance yards and equipment, vehicles, the dispatch center and the offices where engineering related activities and information management activities are conducted.

C. Records Review

Region 4 personnel conduct a review of all the various types of the sewer utility's documents and records. Among the many such documents, these typically include at least the sewer system maps, complaint logs, work orders, sewer assessment reports, standard maintenance procedures, standard operating procedures, typical forms used by field and office personnel, table of organization, safety and training program manuals, and so on.

D. Examine Programs Relative to Performance

Following the management interviews, field evaluations, and records review, Region 4 personnel assess how system performance is affected by the various programs and the

manner in which they are implemented. An attempt is made to determine whether system failures such as sanitary sewer overflows, blockages, and back-ups are due to the lack of adequate programs, due to inadequate implementation of the programs or both. This is based upon a cursory root cause analysis of the identified system failures.

E. Define Deficiencies

As a result of the above determination, Region 4 personnel try to identify specific management, operations and maintenance program deficiencies that are leading to poor or unacceptable system performance. If Region 4 personnel are conducting the audit, a summary of all the factual information is provided to the utility prior to defining deficiencies to assure that there has been no misunderstanding develop during the earlier phases. We strongly recommend that a utility conducting its own self-audit or having a consultant perform the audit include this step prior to defining deficiencies.

F. Identify Program Improvements Needed to Enhance Performance

Once the deficiencies are identified, the next step is to list the programs, which, if improved, should lead to improved system performance. These are the programs for which the Region requires the utility to develop specific, detailed enhancements. *The development of the actual improvements is the responsibility of the utility. Region 4 may elect to review and comment on the improvements.*

G. Develop Schedule for Implementing Improvements

A major part of developing program improvements is establishing a schedule for incorporating them into the utility's overall management, operation and maintenance programs and finally, for implementing the improved programs on a daily basis. If schedules are not developed as part of an implementation plan, Region 4's audit or the utility's self-audit is not complete.

4. Information Needed for Self-Audit Policy Coverage

The following pages outline the information that any utility performing a self-audit must provide to Region 4 in order to obtain coverage under the Self-Audit/Self-Disclosure Policy. These pages *are not an official EPA form* and the required information may be provided using any other appropriate format. What is important is that the information be provided along with the certified self-audit/self disclosure report. If the utility has difficulty in understanding parts of the information request, they should call the Region 4 MOM Work Group.

U.S. EPA Region 4
POTW Management, Operation, and Maintenance Programs Project

INFORMATION NEEDED FOR SELF-AUDIT POLICY COVERAGE

This information must be provided with the participant's self-audit report and signed certification for eligibility. Self-audit coverage will typically be for violations which are un-permitted discharges to waters of the United States. Call Region 4 MOM Work Group if you have difficulty with the questions.

Date: _____

Name: _____

Title: _____

Utility: _____

NPDES Number(s) (if applicable): _____

A. Independent Discovery

1. Has your utility received prior notification of a citizen or third party suit for the violation(s) disclosed or closely related violation(s)? " No. " Yes. If so, please explain:

2. Has your utility received prior notice of commencement of a federal, state, or local agency inspection or investigation, or received an information request from a federal, state, or local agency? " No. " Yes. If so, please explain:

B. Correction and Remediation

[illegible]

C. Prevention of Reoccurrence

[illegible]

D. Repeat Violations

1. Have there been the same, or closely related, violations to those disclosed within the past three years that were identified in a federal, state, or local agency judicial or administrative complaint, enforcement action, or settlement? " No. " Yes. If so, please explain:

2. Have there been the same, or closely related, violations to those disclosed at your utility within the past three years for which your utility has previously received penalty mitigation from U.S. EPA, or a state or local agency? " No. " Yes. If so, please explain:

E. Nature of Violations

1. Did any of the disclosed violations result in any serious harm to human health or the environment? " No. " Yes. If so, provide a full explanation for each of how this conclusion was reached:

2. Did any of the disclosed violations present immediate endangerment to public health or the environment? " No. " Yes. If so, please provide a full explanation for each of how this conclusion was reached:

3. Did any of the disclosed violations violate the specific terms of a judicial or administrative order or consent agreement? " No. " Yes. If so, please identify the order(s) or agreement(s):

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F. Cooperation

In addition to your participation in the MOM Programs Project, please describe any other supporting information which you deem relevant to demonstrating your cooperation with U.S. EPA in disclosing these violations.

5. Certification Needed for Self-Audit Policy Coverage

Submissions made under the Self-Audit/Self Disclosure Policy must be certified to Region 4 at the time of submission of the self-audit/self disclosure report. The following language and signature are required.

The Certification should be completed and signed by a public works director or other ranking official of the participating municipality.

I certify under penalty of law:

(1) that I have personally examined and am familiar with the information submitted with regard to the MOM Programs Project Self-Audit/Self-Disclosure Report and all documents submitted therewith;

(2) that to the best of my knowledge and belief, and based on my inquiry of those individuals immediately responsible for obtaining the information, the submitted information is true, accurate and complete;

(3) that the document(s) submitted to U.S. EPA Region 4 on _____ (date) are complete and authentic, unless otherwise indicated; and,

(4) that the principle executive officer of the municipality/authority has been notified of the Report's conclusions.

I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment.

(name)

(title)

(date)

6. Violations Must be Submitted for Self-Audit/Self Disclosure Policy Coverage

In order for the utility to obtain the benefits offered by EPA's Self-Audit/Self-Disclosure Policy, all Clean Water Act and, if the utility has an NPDES permit, all permit violations that have occurred during the *past five (5) years* must be submitted with the self-audit/self-disclosure report.

A. Un-permitted Discharges Applicable Clean Water Act violations will typically fall into the category of un-permitted discharges to the Waters of the United States. Under most relevant circumstances these occur when a sanitary sewer overflow reaches the waters directly or by way of storm drainage infrastructure. In order to assure that the violations are addressed adequately under the policy, the following information, if existing, should be submitted for each un-permitted discharge:

- Location
- Name of Receiving Water
- Estimate of Overflow Volume
- Description of System Component
- Date/Time Started/Stopped
- Root Cause or Suspected Root Cause
- Steps Taken to Reduce, Eliminate

In order to reduce the effort required by the utility to fulfil this policy requirement, the information may be submitted in the form of work orders, spill reports or monthly or annual summary reports when they exist. However, there must be as much detail as reasonably possible submitted to assure coverage. If in doubt, contact Region 4 to discuss the issue.

B. Permit Violations Applicable permit violations will typically fall into the category of effluent limit violations and/or failure to properly operate and maintain the collection, transmission and treatment system. Region 4 will retrieve effluent limit violations from either EPA's PCS database or from the State. Determination of failure to properly operate and maintain the sewerage infrastructure will be made by Region 4 based upon the self-audit review, the un-permitted discharges and the effluent limit violations.

Chapter 2: Region 4 Audit or Utility Self-Audit Review Work Sheet

United States Environmental Protection Agency
Region 4
Water Management Division
Water Programs Enforcement Branch

61 Forsyth Street, SW
Atlanta, Georgia 30303
February 29, 2000

I. Project Related Information Summary

State: _____

Fiscal Year: _____

Utility Name: _____

Project Code: _____

Invitation: Date: _____

Water Shed Meeting: Date: _____

Audit Due: Date: _____

Audit Received: Date: _____

State Copied: Date: _____

Certification: Date: _____

Self-Audit Coverage: Date: _____

Violations Submitted: Date: _____

Profile Submitted: Date: _____

Last 12 mo. Performance: Date: _____

EPA Project Officer: _____

EPA Self-Audit Reviewer: _____

Review Completed: Date: _____

State Contact: Date: _____

State Review Completed: Date: _____

EPA Peer Reviewer: _____

II. Information About the Utility

Official Utility Name: _____

Applicable NPDES Permit Numbers: _____

If Satellite, NPDES Number of Regional Treatment Facility: _____

Name of Responsible Official: _____

Title: _____

Primary Contact: _____ Title: _____ Phone: _____

Secondary Contact: _____ Title: _____ Phone: _____

Address: _____

Mailing Address: _____

III. Profile of Utility - Used to Develop Site Specific Understanding of Utility

Population Served: _____

Number of Customers: _____

Number of Treatment Plants: _____

Total Wastewater Design Treatment Capacity: _____

Total Volume of Wastewater Treated: _____

Miles of Gravity Sewers: _____

Number of Manholes: _____

Number of Inverted Siphons: _____

Number of Pump Stations: _____

Miles of Force Main: _____

Number of Employees: _____

Annual Capital Improvement Budget: _____

Annual Operation and Maintenance Budget: ... _____

Total Annual Operating Budget: _____

IV. System MOM Programs Recent Performance Summary														
Performance Measures for Previous 12 Months					Year / Month									
	A. Customer Complaints													
	B. (NPDES) Permit Violations													
	C. Number of Capacity Related Overflows													
	D. Number of Maintenance Related Overflows													
	E. Number of Operations Related Overflows													
	F. Number of Blockages													
	G. Number of Cave-Ins													
	H. Number of Pump Station Failures													
	I. Peak Flow Factors at Treatment Plant (1 hour high/dry month avg.)													
	J. Monthly Average Treatment Plant Flow Rate (gpcd)													
	K. Monthly High One Day Treatment Flow Rate (gpcd)													
	L. Number of By-Passes at Treatment Plant													
	M. Volume of Treatment Plant By-Passes													
	N. WWTP Weekly Average Influent BOD Concentration													

Pg Topic's Location in Self-Audit /EPA Audit Report (BATES #) ? Tag for Telephone Follow-Up LM If Needed, Does Utility Have Program N Is it Documented in Writing ° Is the Program Adequate @ Is Improvement Needed (#) Indicates Cross Reference Page				P	g	?	L	M	N	°	@	Synopsis/Comment
V. Management Programs												
A. Table of Organization												
1. Organizational Chart												
			a. Organizational Units Shown									
			b. Lines of Authority Shown									
			c. Organizational Units' Functions Described									
			d. Organizational Units' Positions Shown									
			e. Duties Described									
			f. Positions Budgeted and Filled Indicated									
2. Relation to Other Departments												
			a. Free Standing Organization									
			b. Relation to Wastewater Treatment									
			c. Department of Public Works									
			d. Relation to Building Permits Function									
			e. Relation to Building Inspector Function									
			f. Are Other Utilities Such as Gas & Electric Conducted									

Pg Topic's Location in Self-Audit /EPA Audit Report (BATES #) LM If Needed, Does Utility Have Program ? Tag for Telephone Follow-Up N Is it Documented in Writing ° Is the Program Adequate @ Is Improvement Needed (#) Indicates Cross Reference Page				P g	?	L M	N	°	@	Synopsis/Comment
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			B. Training Programs							
			1. Technical Training Programs							
			a. Training and Refresher Training Requirement							
			b. Conferences, Seminars							
			c. Certification							
			d. Records							
			e. Tied to Promotion/Pay/Able to Work							
			2. Skills Training Program (Equipment, Tasks)							
			a. Training and Refresher Training Requirement							
			b. Manufacturer/Supplier Training							
			c. Conferences, Seminars							
			d. Certification							
			e. Records							
			f. Tied to Promotion/Pay/Able to Use Equipment							

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		3. Safety Training Program								
			a. Training and Refresher Training Requirement							
			b. Conferences, Seminars							
			c. Weekly Safety Meetings							
			d. Certification							
		C. Safety Programs (7)								
		1. Safety Department or Committee								
			a. Safety Department							
			b. Safety Officer (Authority)							
			c. Written Safety Policy							
			d. Standardized Reporting Forms							
			e. Review Board							
		2. Confined Space Entry								
			a. Locations Marked							
			b. Permit System							

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			c. Standard Confined Space Entry Procedure							
			3. General Safety Procedures							
			a. Defensive Driving							
			b. First Aid							
			c. CPR							
			d. Personal Sanitation							
			e. Personal Protection Clothing							
			4. Traffic Management							
			a. Standard Traffic Management Procedure							
			b. Off Hour Scheduling							
			c. Coordination with Law Enforcement							
			5. Lock Out/Tag Out							
			a. Equipment Marked							
			b. Authorized Personnel Limitation							
			c. Information on Tag (Date)							

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			d. Permit Required							
			6. Safety Equipment							
			a. Tripod and Hoist							
			b. Atmosphere Testing Equipment							
			c. Self Contained Breathing Apparatus							
			d. Lights and Barricades							
			e. Exhaust Fans							
			f. Personal Protection Clothing							
			7. Performance Measures							
			a. Injuries							
			b. Lost Days							
			c. Workman's Compensation Claims							
			d. Records to Management Information System							
			D. Utility Information Management System(s) (IMS)							

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		1. Management Programs Information Management Systems											
			a. Operations Summary - Daily/Weekly										
			b. Maintenance Summary - Daily/Weekly										
			c. Complaint Summary - Daily/Weekly (12)(27)										
			d. Rehabilitation Summary										
			e. System Performance Summary - Daily/Weekly										
			f. Computer Based										
			g. Management Decision Making Process										
		2. Operations Programs Information Management Systems											
			a. Operating Reports										
			b. Standard Forms										
			c. Field Supervisor Review										
			d. Maintenance of Records										
			e. Computer Based										
			f. Feeds into Management Information Systems										

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		3. Maintenance Programs Information Management System(s)											
		a. Maintenance Reports											
		b. Standard Forms											
		c. Field Supervisor Review											
		d. Maintenance of Records											
		e. Computer Based											
		f. Feeds into Management Information Systems											
		4. Complaint Management and Tracking Information Management Systems (10, 12)(27)											
		a. Complaint Reports (44)											
		b. Standard Forms											
		c. Field Supervisor Review											
		d. Maintenance of Records											
		e. Computer Based											
		f. Feeds into Management Information Systems											
		5. Performance Indicators Computation Program											

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			a. Performance of Utility Operations							
			b. Performance of Utility Maintenance							
			c. Performance of Complaint Response (12)(27)(44)							
			d. Performance of Sewer and Treatment Systems							
			e. Computer Based							
			f. Feeds into Management Information Systems							
		E. Engineering Programs								
		1. Collection and Transmission System Plans Program								
			a. As-Built Plans on File							
			b. Procedure for Recording Changes/Updates							
			c. Availability to Field Crews							
		2. System Inventory Program								
			a. Inventory of Sewer Attributes (age, pipe size, material, invert elevation, inverted siphons, pump stations, etc.)							
		3. Mapping Program								
			a. Mapping System							

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			b. Lines, Manholes, Appurtenances Coded							
			c. Information in a GIS							
			d. Links to Information Management Systems							
		4. Sewer System Design Program								
			a. Documented Design Criteria (slope, bedding, etc.)							
			b. Standard Construction Details (manholes, etc.)							
			d. Standard Materials and Construction Practices							
			e. Standard Design Review Process							
			f. Standard Review Forms							
			g. Do Construction Standards Apply to Service Laterals							
		5. Sewer Construction Program								
			a. Who Constructs New Sewers							
			b. Does Utility Review/Approve Design							
			c. Are New Sewers Under Warranty							
		6. Construction Inspection Program								

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			a. Standard New Construction Inspection Procedures							
			b. Standard New Construction Testing Procedures							
			c. Does Utility do Inspection							
			d. Does Utility do Testing							
			e. Inspection/Testing Standard Forms or Reports							
			f. Inspector/Tester Qualifications							
			g. Inspection Supervision by Professional Engineer							
			h. New Sewer Construction Televised							
			7. Acquisition Considerations Program							
			a. Does Utility Acquire Sewerage Infrastructure							
			b. Pre-Acquisition Inspection/Evaluation							
			c. Comparison to Standard Design and Construction Criteria							
			8. Continuing Sewer System Assessment Program							
			a. Sewerage Assessment Priority Parameters (Information used to set assessment priorities)							
			i. Complaints							

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				ii. Flow Monitoring							
				iii. Overflows							
				iv. Pump Station Run Times							
				v. Field Crew Work Orders							
				vi. Preliminary Sewer Assessment							
				vii. Other							
				b. Date of Last SSES							
				i. Were Identified Defects Repaired							
				ii. Are defects scheduled for repair in CIP							
				iii. Is Report Available							
				c. Dyed Water Flooding Program							
				i. Standard Dyed Water Procedures							
				ii. Manhole Dyed Water Forms							
				iii. Dyed Water Inspection Performance Goals							
				iv. Dyed Water Flooding Information Management							

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			d. Corrosion Defect Identification Program (36)							
			i. Corrosion Identification Procedures							
			ii. Corrosion Identification Forms							
			iii. Corrosion Identification Performance Goals							
			v. Corrosion Defect Analysis							
			iv. Corrosion Defect Information Management							
			e. Routine Manhole Inspection Program							
			i. Standard Manhole Inspection Procedures							
			ii. Manhole Inspection Forms							
			iii. Manhole Inspection Performance Goals							
			iv. Manhole Defect Analysis							
			v. Manhole Information Management							
			f. Flow Monitoring Program to Support Engineering Analyses (37)							
			i. Permanent Flow Meters							
			ii. Temporary Flow Meters							

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LM	If Needed, Does Utility Have Program	g		M				
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N	Is it Documented in Writing							
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@	Is Improvement Needed							
	(#) Indicates Cross Reference Page							

				iii. Sewer Cleaning Associated with Flow Monitoring							
				iv. Midnight Flow Observations (Wet/Dry)							
				v. Rainfall Measurement							
				vi. Flow Monitoring Information Management							
				g. CCTV Program for Sewer Assessment							
				i. Dedicated CCTV Personnel							
				ii. Dedicated CCTV Equipment							
				iii. CCTV SOPs Including Cleaning							
				iv. CCTV by Contract							
				v. CCTV Performance Measures							
				vi. CCTV Information Management							
				vii. Retention of CCTV Tapes							
				h. Gravity System Defect Analysis Program							
				i. Standard Defect Code							
				ii. Defect Identification Guidelines							

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				iii. Defect Determination							
				i. Smoke Testing Program							
				i. Standard Smoke Testing Procedures							
				ii. Smoke Testing Forms							
				iii. Smoke Testing Performance Goals							
				iv. Smoke Testing Defect Analysis							
				v. Smoke Testing Information Management							
				j. Service Lateral Investigations Program							
				i. Service Lateral Investigation Techniques							
				ii. Service Lateral Investigation Forms							
				iii. Service Lateral Investigation Performance Goals							
				iv. Service Lateral Investigation Analysis							
				v. Service Lateral Investigation Information Management							
				k. Pump Station Performance and Adequacy Program							
				i. Pump Run Time Meters							

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				ii. Nominal Average Pump Operating Time									
				iii. Root Cause Failure Analysis									
				iv. Remote Sensing									
				v. Pump Station Performance Information Management									
				9. Infrastructure Rehabilitation Program									
				a. Gravity Lines Rehabilitation Program									
				i. Sewer Rehabilitation Priorities									
				ii. Sewer Rehabilitation Completed (Techniques)									
				iii. Sewer Rehabilitation Scheduled									
				b. Manhole Rehabilitation Program									
				i. Manhole Rehabilitation Priorities									
				ii. Manhole Rehabilitation Completed (Techniques)									
				iii. Manhole Rehabilitation Scheduled									
				c. Pump Station Rehabilitation Program									
				i. Pump Station Rehabilitation Priorities									

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				ii. Pump Station Rehabilitation Completed							
				iii. Pump Station Rehabilitation Scheduled							
				d. Pressure System Rehabilitation Program							
				i. Pressure System Rehabilitation Priorities							
				ii. Pressure System Rehabilitation Completed							
				iii. Pressure System Rehabilitation Scheduled							
				10. System Capacity Assurance Program							
				a. Capacity Assurance Process for New Connections							
				i. Integrated into Building Permit Process							
				ii. Integrated into New Acquisition Process							
				iii. Computation Techniques Used							
				b. Standard Design Flow Rate Rules of Thumb							
				i. Regarding pipe roughness							
				ii. Regarding Manhole Head Losses							
				iii. Are As-Builts Assumed to Be Accurate							

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				iv. Regarding gpcd							
				c. Projected Flow Impact Modeling/Calculation Techniques							
				i. Hydraulic Model of Gravity System							
				ii. Limited by Pipe Diameter							
				iii. Hydraulic Model of Pressure System							
				iv. Other Techniques							
				d. Metering of Related Existing Peak Flows							
				i. Are Flows Metered in Support of Analysis							
				ii. Are Peak Flows Manually Observed							
				e. Certification of Adequate Capacity							
				i. Does Evaluation Require P.E							
				ii. Does Evaluation Require Signed Certification							
				iii. How is Cumulative Analysis Tracked							
				iv. Is Analysis Related to I/I Reduction Program							
				f. Capacity Assurance Information Management Program							

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	F. Sanitary Sewer Overflow Reporting and Notification Program (Also see Contingency Plan) (31)										
		1. Un-permitted Discharge Reporting Program									
			a. State Agency								
			i. State Agency Reporting Requirements								
			ii. Procedure for Meeting State Requirements								
			b. Reports to Public/Other Organizations								
			i. Downstream Drinking Water Suppliers								
			ii. Public Health Authorities								
			iii. Stream Posting								
			iv. Annual Summary Report Available to Public								
			c. Standard Form								
			i. Location								
			ii. Name of Receiving Water								
			iii. Estimate of Overflow Volume								
			iv. Description of System Component								

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N Is it Documented in Writing							
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				v. Date/Time Started/Stopped							
				vi. Root Cause or Suspected Root Cause							
				vii. Steps Taken or to be Taken to Reduce, Eliminate							
				d. Un-permitted Discharge Information Management							
				2. Sanitary Sewer Overflow Notification Program							
				a. State Agency							
				i. State Agency Reporting Requirements							
				ii. Procedure for Meeting State Requirements							
				b. Reports to Public/Other Organizations							
				ii. Public Health Authorities							
				ii. Posting							
				iii. Annual Summary Report Available to Public							
				c. Standard Form							
				i. Location							
				ii. Name of Receiving Water							

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			iii. Estimate of Overflow Volume							
			iv. Description of System Component							
			v. Date/Time Started/Stopped							
			vi. Root Cause or Suspected Root Cause							
			vii. Steps Taken or to be Taken to Reduce, Eliminate							
			d. Sanitary Sewer Overflow Information Management							
			G. Financing and Cost Analysis Program							
			1. Operations Cost Analysis Program							
			a. Labor and Equipment							
			b. Activities That Can be Contracted							
			2. Maintenance Cost Analysis Program							
			a. Labor and Equipment							
			b. Activities That Can be Contracted							
			3. Capital Improvement Program Funding							
			a. Is There a Five Year Planning Horizon							

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			b. How Much Spent on Improvements Last Five Years							
			c. How Much to be Spent During Next Five Years							
			d. What is Current Indebtedness							
			4. Management Programs Cost Analysis Program							
			a. Support of Other Municipal Functions							
			b. Activities That Can be Out-Sourced or Contracted							
			5. Life Cycle Cost Analysis							
			a. Is Life Cycle Cost Analysis Used for Infrastructure							
			b. Is Life Cycle Cost Analysis Used for Equipment							
			6. Budget and Customer Rate Setting Analysis							
			a. Is Budget Calculated on Programs' Implementation							
			b. Are User Rates Based on Budget							
			H. Equipment and Tools Management Programs							
			1. Spare Parts Inventory Management Program (Spare Parts Includes Spare Pipe)							
			a. Spare Parts Storage Location							

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			b. Critical Spare Parts Identified							
			c. Spare Parts Access Control							
			d. Spare Parts Inventory Management							
			e. Computerized							
			f. Use of Local Vendors for Common Parts							
			g. Spare Parts Carried on Vehicles							
			2. Equipment and Tools Repair Management Program							
			a. Equipment and Tools Storage Location							
			c. Equipment and Tools Access Controlled							
			d. Equipment and Tools Inventory Management							
			e. Computerized							
			3. Vehicle Repair Management Program							
			a. Vehicle Maintenance							
			b. Vehicle Repair							
			c. Turn Around Time and Cost Factor							

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			d. Life Cycle Costs								
			4. Supplies Management Program								
			a. Supplies Storage Location								
			b. Supplies Access Control								
			c. Supplies Inventory Management								
			d. Computerized								
			e. Supplies Carried on Vehicles								
			I. Customer Service Programs								
			1. Complaint Management Program (12)								
			a. Complaint/Customer Service								
			b. Work Order Generation (44)								
			c. Dispatch								
			d. Standard Forms								
			e. Standard Codes								
			f. Follow-Up with Customer								

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			g. Complaint Response Performance							
			h. Complaint Records Location							
			2. Public Information Program							
			a. Utility's Activities Such as Smoke Testing							
			b. Notification re: Major Construction or Maintenance							
			c. Communication with Other Departments/Agencies							
			3. Public Education Program							
			a. Defined Public Education Program							
			b. Public Meetings							
			c. Flyers/Bill Inserts							
			J. Legal Support Programs							
			1. Inter-Jurisdictional Agreement Program							
			a. Agreement with Satellite System(s)							
			b. Agreement with Regional Treatment Utility(s)							
			c. Flow Based							

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			d. Management, Operation and Maintenance Provisions							
			e. Life of Agreement							
			f. Easily Modified							
			2. Ordinances							
			a. Sewer Use Ordinance							
			b. Grease Management Ordinance							
			c. Pretreatment Ordinance							
			d. Private Lateral Ordinance							
			d. Other Pertinent Ordinances							
			3. Pretreatment Legal Support Program (36)							
			a. Legal Staff Available for Case Work							
			b. Legal Staff Available for Counsel							
			c. Legal Staff Available to Modify Ordinance							
			4. Grease Control Legal Support Program							
			a. Legal Staff Available for Case Work							

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LM	If Needed, Does Utility Have Program	g		M				
?	Tag for Telephone Follow-Up							
N	Is it Documented in Writing							
°	Is the Program Adequate							
@	Is Improvement Needed							
	(#) Indicates Cross Reference Page							

			b. Legal Staff Available for Counsel						
			c. Legal Staff Available to Modify Ordinance						
			5. Service Laterals Legal Support Program						
			a. Legal Staff Available for Case Work						
			b. Legal Staff Available for Counsel						
			c. Legal Staff Available to Modify Ordinance						
			6. Septic Tank Haulers Legal Support Program						
			a. Legal Staff Available for Case Work						
			b. Legal Staff Available for Counsel						
			c. Legal Staff Available to Modify Ordinance						
			7. "Call Before You Dig" Legal Support Program						
			a. Legal Staff Available for Case Work						
			b. Legal Staff Available for Counsel						
			c. Legal Staff Available to Modify Ordinance						
			K. Water Quality Monitoring Program						

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		1. Routine Water Quality Monitoring Program										
			a. Location of Monitoring Stations									
			b. Sampling Parameters									
			c. Standard Sampling Procedures									
			d. Quality Assurance/Quality Control Program									
			e. Record Maintenance									
		2. Investigative Water Quality Monitoring Program										
			a. Location of Monitoring Stations									
			b. Sampling Parameters									
			c. Standard Sampling Procedures									
			d. Quality Assurance/Quality Control Program									
			e. Record Maintenance									
		3. Water Quality Monitoring for Spill Impact (31)										
			a. Location of Monitoring Stations									
			b. Sampling Parameters									

Pg	Topic's Location in Self-Audit /EPA Audit Report (BATES #)	P	?	L	N	°	@	Synopsis/Comment
LM	If Needed, Does Utility Have Program	g		M				
?	Tag for Telephone Follow-Up							
N	Is it Documented in Writing							
°	Is the Program Adequate							
@	Is Improvement Needed							
	(#) Indicates Cross Reference Page							

			c. Standard Sampling Procedures						
			d. Quality Assurance/Quality Control Program						
			e. Record Maintenance						
		L. Contingency Plan for Sewer & Treatment System (22)							
		1. Contingency Planning Process							
			a. Management Process for Developing Plan						
			b. Preparedness Committee						
			c. System Overview and Vulnerability						
			d. Severe Natural Events Considered						
			e. Failure of Critical System Component(s)						
			f. Vandalism or Third Party Events						
			g. Root Cause Analysis Protocol						
		2. Response Flow Diagram							
			a. Includes Senior Management						
			b. Includes Six (6) Major Component Plans						

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		3. Public Notification Plan								
			a. Criteria Established to Initiate Public Notification							
			b. Step by Step Procedure Flow Diagram							
			c. Managers Named with Phone Numbers							
			d. Plan for Regular Business Hours							
			e. Plan for Off Hours, Week-Ends and Holidays							
			f. List of " <i>Public Contacts</i> " with Phone Numbers							
			g. Managers Authorized to Give Statements Identified							
			h. Pre-Scripted News Releases							
		4. Agency Notification Plan								
			a. Criteria Established to Initiate Agency Notification							
			b. Step by Step Procedure Flow Diagram							
			c. Managers Named with Phone Numbers							
			d. Plan for Regular Business Hours							
			e. Plan for Off Hours, Week-Ends and Holidays							

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			f. List of "Agency Contacts" with Phone Numbers							
			g. Managers Authorized to Contact Agency(s) Identified							
			h. Standard Forms and Up-Date Forms							
			5. Emergency Flow Control Plan							
			a. Criteria Established to Initiate Flow Control							
			b. Flow Re-Routing							
			c. Flow Diversion							
			d. House-Hold Flow Reduction/Advisories							
			e. Commercial Flow Reduction/Advisories							
			f. Water Pressure Reduction/Advisories							
			g. Pretreatment SIU Information							
			h. Treatment Plant Options							
			6. Emergency Operations and Maintenance Plan							
			a. Criteria Established to Initiate Emergency O and M							
			b. Step by Step Procedure Flow Diagram							

Pg Topic's Location in Self-Audit /EPA Audit Report (BATES #) L If Needed, Does Utility Have Program M Tag for Telephone Follow-Up N Is it Documented in Writing ^o Is the Program Adequate @ Is Improvement Needed (#) Indicates Cross Reference Page				P g	?	L M	N	^o	@	Synopsis/Comment
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			c. Managers Named with Phone Numbers								
			d. Plan for Regular Business Hours								
			e. Plan for Off Hours, Week-Ends and Holidays								
			f. Stand-By Equipment								
			g. Stand-By Contractors								
			h. Access to Critical Spare Parts								
		7. Preparedness Training Program									
			a. Specialized Training Course								
			b. Field Trials								
			c. Special Safety Training Considerations								
			d.								
		8. Water Quality Monitoring Plan									
VI. Operation Programs											
	A. Pump Station Operation Programs										
		1. Routine Operating Programs									

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			a. Manned Pump Stations - SOPs							
			b. Un-Manned Pump Stations - SOPs							
			c. Number of Crews/Personnel							
			d. Elapsed Time Meters - Record Times							
			e. System Pressure - Record Pressures							
			f. Wet Well Set Points							
			g. Check Alarms							
			h. Check Stand-By Power							
			i. Standard Forms							
			j. Established Pump Station Checking Program							
			k. Performance Measures							
			2. Emergency Operating Programs (31)							
			a. Manned Pump Stations - Emergency SOPs							
			b. Un-Manned Pump Stations - Emergency SOPs							
			c. Stand-By Power							

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			d. Portable Power							
			e. Portable Pumping							
			f. Standard Forms							
			g. Performance Measures							
			h. Emergency By-Pass							
		B. Pretreatment Programs (Sewer and Plant Protection - Not an Evaluation of the Pretreatment Program) (29)								
			1. Industrial User Permitting Program							
			2. Inspection and Sampling Program							
			3. Enforcement Program							
		C. Corrosion Control Programs (16)								
			1. Inspection Program							
			2. Control Measures Program							
			3. Monitoring Program							
			4. Performance Measures							
		D. Grease Trap Inspection and Enforcement Programs								

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		1. Permitting Program											
		2. Inspection Program											
		3. Enforcement Program											
		4. Performance Measures											
		E. New Connection Tap-In Program											
		1. Installation of New Service Taps											
		2. Inspection Program											
		3. Enforcement Program											
		4. Performance Measures											
		F. Flow Monitoring Field Operation Programs (17)											
		1. Permanent Stations											
		a. Routine Servicing											
		b. Contract											
		c. Crew Size and Equipment											
		2. Temporary Stations											

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			a. Routine Servicing							
			b. Contract							
			c. Crew Size and Equipment							
	G. Septic Tank Haulers Program									
			1. Permitting Program							
			2. Inspection Program							
			3. Enforcement Program							
			4. Performance Measures							
	H. "Call Before You Dig" Program									
			1. Permitting Program							
			2. Inspection Program							
			3. Enforcement Program							
			4. Performance Measures							
VII. Maintenance Programs										
	A. Pump Station Preventative Maintenance									

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		1. Electrical Maintenance											
		a. Manned Stations - SMPs											
		b. Un-Manned Stations - SMPs											
		c. Number of Crews/Personnel											
		d. Scheduling											
		e. Standard Forms											
		f. Records											
		g. Performance Measures											
		2. Mechanical Maintenance											
		a. Manned Stations - SMPs											
		b. Un-Manned Stations - SMPs											
		c. Number of Crews/Personnel											
		d. Scheduling											
		e. Standard Forms											
		f. Records											

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			g. Performance Measures							
			3. Physical Maintenance							
			a. Manned Stations - SMPs							
			b. Un-Manned Stations - SMPs							
			c. Number of Crews/Personnel							
			d. Scheduling							
			e. Standard Forms							
			f. Records							
			g. Performance Measures							
			B. Force Main Preventative Maintenance							
			1. Air Release Valves							
			a. Number of Crews/Personnel							
			b. Scheduling							
			c. Standard Forms							
			d. Records							

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			e. Performance Measures							
			2. Valve Exercise Program							
			a. Number of Crews/Personnel							
			b. Scheduling							
			c. Standard Forms							
			d. Records							
			e. Performance Measures							
			C. Gravity Line Preventative Maintenance							
			1. Routine Hydraulic Cleaning							
			a. Need Determination/Scheduling							
			b. Number of Crews/Personnel							
			c. Equipment (Jetter, Combination Unit)							
			d. Scheduling							
			e. Standard Forms							
			f. Records							

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			g. Performance Measures							
			2. Routine Mechanical Cleaning							
			a. Need Determination/Scheduling							
			b. Number of Crews/Personnel							
			c. Equipment (Rodder, Bucket Machine)							
			d. Scheduling							
			e. Standard Forms							
			f. Records							
			g. Performance Measures							
			3. Root Control Program							
			a. Need Determination/Scheduling							
			b. Number of Crews/Personnel							
			c. Scheduling							
			d. Hydraulic Root Removal							
			e. Mechanical Root Removal							

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			f. Chemical Control							
			g. Standard Forms							
			h. Records							
			i. Performance Measures							
		4. Manhole Preventative Maintenance								
			a. Need Determination/Scheduling							
			b. Number of Crews/Personnel							
			c. Scheduling							
			d. Rings and Lids							
			e. Structural Repair							
			f. Standard Forms							
			g. Records							
			h. Performance Measures							
		D. Maintenance of Way								
		1. Maintenance of Rights-of-Way and Easements								

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			a. Need Determination/Scheduling							
			b. Number of Stream Crossings							
			c. Number of Crews/Personnel							
			d. Scheduling							
			e. Standard Forms							
			f. Records							
			g. Performance Measures							
		2. Monitoring of Street Paving								
			a. Need Determination/Scheduling							
			b. Coordination with Street/Highway Department							
			c. Manhole/Valve Raising							
			d. Performance Measures							
		3. Line Location for Third Parties								
			a. Need Determination/Scheduling							
			b. Number of Crews/Personnel							

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			c. Scheduling							
			d. Standard Forms							
			e. Records							
			f. Performance Measures							
	E. Un-Scheduled Maintenance (31)									
		1. Response to Complaints								
			a. Dispatch							
			b. Customer Follow Up							
			c. Need Determination/Scheduling							
			d. Number of Crews/Personnel							
			e. Scheduling Prioritization Protocol							
			f. Standard Forms							
			g. Records							
			h. Performance Measures (e.g. Response Time, etc.)							
			i. Mapping							

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VIII. Determination of Appropriate Next Step									
A. State Response and Comments									
		1. Utility's Compliance History with State:							
		2. State's Audit Review Comments: Incorporated Attached State Did Not Review							
B. Reviewer's Summary									
		1. Self-Audit Eligibility							
		2. Enforcement Response Evaluation - September 8, 1999 MOM Project EMS							
			Audit Timeliness:		Timely: ()	# 30 Days Late: ()	\$ 30 Days Late: ()	Not Submitted: ()	
			Audit Situation		Adequate: ()	Partially Adequate: ()	Incomplete: ()		
			MOM Programs Status		Adequate: ()	Need Some Improvement: ()		Need Substantial Improvement: ()	
			Un-permitted Discharges		N/A: ()	Isolated and Infrequent: ()		Chronic and Frequent: ()	
			Un-Permitted Discharges		Capacity Related: ()	Maintenance Related: ()		Capacity and Maintenance Related : ()	
			Permit Compliance - O&M Provision Applicable:		N/A: ()	WWTP:	Y	N	Sewers: Y N

Pg	Topic's Location in Self-Audit /EPA Audit Report (BATES #)	P g	?	L M	N	°	@	Synopsis/Comment
	LM If Needed, Does Utility Have Program							
	? Tag for Telephone Follow-Up							
	N Is it Documented in Writing							
	° Is the Program Adequate							
	@ Is Improvement Needed (#) Indicates Cross Reference Page							

		Permit Compliance - Effluent Limits: N/A: ()	Significant Non-Compliance	Y	N
		3. Enforcement Response Evaluation - December 1996 EMS Guidance (Egregiousness)			
		4. EMS Penalty Calculation			
		5. Appropriate Next Step Recommendation: EPA Audit	Letter of Commitment	NOV	AO APO Civil Referral
		Enforcement Officer Name:			
		Enforcement Officer Signature: _____		Date: _____	
		State Reviewer Name:		Phone Number:	
		Peer Reviewer Name:			
		Peer Reviewer Signature: _____		Date: _____	
		C. Approval of Appropriate Next Step			
		Program Manager Name:			
		Program Manager Concurrence: _____		Date: _____	
		State Concurrence: _____		Date: _____	
		Branch Chief Approval: _____		Date: _____	